

**United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report**

Case Number

1000-0484

Case Title:

Shell Puget Sound Refinery

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

Meeting with Sally Buckingham

Activity Date:

April 6, 2015

Reporting Official and Date:

(b) (6), (b) (7)(C)

Special Agent

21-MAY-2015, Signed by (b) (6), (b) (7)(C)

Approving Official and Date:

(b) (6), (b) (7)(C)

Assistant Special Agent in Charge

29-MAY-2015, Approved by (b) (6), (b) (7)(C)

Assistant Special Agent in Charge

SYNOPSIS

On April 6, 2015, U.S. Environmental Protection Agency (EPA) - Criminal Investigation Division (CID) Special Agent (b) (6), (b) (7)(C) met with Sally Buckingham, Process Safety Management (PSM) inspector with the Washington Department of Labor and Industries (LNI) regarding LNI's inspection and enforcement history for the Shell Puget Sound Refinery (Refinery). The meeting took place at Northwest Clean Air Agency's (NWCAA) offices in Mount Vernon, WA. Also present was NWCAA compliance manager, Toby Mahar. Buckingham advised that the Refinery had recently signed a settlement agreement with Washington State's Attorney General's office over violations that occurred in 2013 when the east flare started on fire during a shutdown.

DETAILS

On April 6, 2015, U.S. Environmental Protection Agency (EPA) - Criminal Investigation Division (CID) Special Agent (b) (6), (b) (7)(C) met with Sally Buckingham, Process Safety Management (PSM) inspector with the Washington Department of Labor and Industries (LNI) regarding LNI's inspection and enforcement history for the Shell Puget Sound Refinery (Refinery). The meeting took place at Northwest Clean Air Agency's (NWCAA) offices in Mount Vernon, WA. Also present was NWCAA compliance manager, Toby Mahar. Buckingham advised that the Refinery had recently signed a settlement agreement with Washington State's Attorney General's (AG's) office over violations that occurred in 2013 when the east flare started on fire during a shutdown.

Buckingham advised that she is currently the lead LNI investigator for PSM at the Refinery. She explained that she recently worked with the AG's office on a penalty for the Refinery for PSM violations that resulted in the east flare detonating and catching on fire. She stated that in 2013, managers at the Refinery decided to shortcut procedures during the east flare shutdown. Buckingham reported that the cause of the 2013 detonation and fire was due the upstream lines not being properly decontaminated. In addition, the flare had a deteriorated mol seal at the tip which allowed oxygen and fire to creep down the stack, subsequently flashing back toward the open flange. The flashback of fire narrowly missed operators who were working on the flare at the time.

Buckingham stated that based on her investigation into the 2013 east flare incident, she learned that the Refinery operators deviated from the regular east flare shutdown procedures. She stated that in 2013, the operators deviated from a different section of the procedures which involved the introduction of purge gas into the flare.

Buckingham informed that based on the information she has been able to obtain from her investigation into the February 20, 2015 incident, it appears that the Refinery again deviated from

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the east flare shut down procedures which is a violation of LNI's PSM regulations. (b) (5)
(b) (5)
(b) (5)

On April 9, 2015, Buckingham emailed SA ^{(b) (6), (b) (7)(C)} some electronic documents from her investigation into the 2013 flare fire incident. Documents received from Buckingham are attached to this IAR for reference.

ATTACHMENT

Buckingham Summary

Flare 2

LNI Case file

LNI Case file Part 2

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